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December 22, 2023

Honorable Michael B. Kaplan
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Clarkson S. Fisher US Courthouse
402 East State Street
Trenton, NJ 08608

Re: BlockFi, Inc., et al.
Case No. 22-19361 MBK

Dear Judge Kaplan:

This firm serves as local counsel for the Plan Administrator in the above-referenced proceedings. We write to respectfully request to withdraw:

- (i) the Debtors' Motion for Entry of an Order (I) Approving the Sale and Assignment of Certain of the Debtors' Institutional Loans Free and Clear or All Claims, Liens, Rights, Interests, and Encumbrances, (II) Authorizing the Debtors to Enter into the Assignment Agreements, and (III) Granting Related Relief [Docket No. 701]; and
- (ii) (ii) the Debtors' Motion to File Under Seal Exhibit A to the Debtors' Motion for Entry of an Order (I) Approving the Sale and Assignment of Certain of the Debtors' Institutional Loans Free and Clear or All Claims, Liens, Rights, Interests, and Encumbrances, (II) Authorizing the Debtors to Enter into the Assignment Agreements, and (III) Granting Related Relief [Docket No. 702] (collectively, the "Motions").

The Motions were filed on March 29, 2023, and are scheduled for hearing on Tuesday, January 16, 2024, at 11:00 a.m. ET. No responses to the Motions were received.



Thank you for your time and attention to this matter.

Respectfully submitted,

GENOVA BURNS LLC

/s/ Donald W. Clarke

DONALD W. CLARKE

cc: All Counsel of record via electronic filing